

Exhibit 26

1 PAUL CARLUCCI
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X
5 AUSTIN FENNER and IKIMULISA LIVINGSTON,

6 Plaintiffs,
7 -against-

09 CIV 9832 (BSJ) (RLE)

8 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
9 THE NEW YORK POST and DAN GREENFIELD and
10 MICHELLE GOTTHELF,

11 Defendants.

12 -----X
13 SANDRA GUZMAN,

14 Plaintiff,

15 vs. 09 CIV 9323 (BSJ) (RLE)

16 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
17 THE NEW YORK POST, and COL ALLAN, in his
18 official and individual capacities,

19 Defendants.

20 -----X

21 VIDEOTAPED DEPOSITION OF PAUL CARLUCCI
22 New York, New York
23 Friday, June 22, 2012

24 REPORTED BY: BARBARA R. ZELTMAN
25 (BOBBIE)

Professional Stenographic Reporter

Job Number: 50903

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1 PAUL CARLUCCI

2 Q Who is that?

3 A Michael Racano.

4 Q Racano?

5 A Racano.

6 Q Who else?

7 A Senior Vice President, Howard
8 Adler.

9 Head of Human Resources, Amy
10 Scaldone.

11 Q Anyone else?

12 A Not off the top of my head that
13 reports directly to me.

14 Q Do you have any role in the hiring
15 of editors who work for The New York Post?

16 A No, I do not.

17 Q Have you ever played a role in the
18 hiring of the editors at The New York Post?

19 A No, I have not.

20 Q Mr. Carlucci, do you know who has
21 the authority to hire editors who work for
22 The New York Post?

23 MR. KASOWITZ: I'm going to
24 object to the form.

25 You can answer.

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1 PAUL CARLUCCI

2 A No, I do not.

3 Q So as you sit here today, you have
4 no idea who is responsible for hiring the
5 editors of the paper you are publisher of?

6 MR. KASOWITZ: Object to form.

7 Asked and answered.

8 A No, I do not.

9 Q Have you ever inquired in terms of
10 who has the authority to hire editors at
11 The New York Post?

12 A Not that I can recall.

13 Q Well, do you have any authority to
14 terminate an editor at The New York Post?

15 A No, I do not.

16 Q Have you ever terminated any editor
17 at The New York Post since you've served as
18 publisher of that newspaper?

19 A No, I have not.

20 Q Do you know who has the authority
21 to terminate editors at The New York Post?

22 MR. KASOWITZ: Object to form.

23 You can answer.

24 A No, I do not.

25 Q Well, you are the Publisher of

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1 PAUL CARLUCCI

2 The New York Post, correct?

3 MR. KASOWITZ: Objection.

4 Asked and answered.

5 A Correct.

6 Q And you've been the Publisher of
7 The New York Post for seven years, correct?

8 A Correct.

9 Q In your seven years as serving as
10 Publisher of The New York Post, did you ever
11 inquire regarding who had authority for
12 terminating editors at The New York Post?

13 MR. KASOWITZ: Objection.

14 Asked and answered.

15 You can answer.

16 A No.

17 Q Who is the highest ranking official
18 on the Editorial side of The New York Post?

19 A That would be the Editor in Chief.

20 Q Who is that?

21 A That would be Col Allan.

22 Q Does Col Allan report to you?

23 A No, he does not.

24 Q Has he ever reported to you?

25 A Not that I am aware of.

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1 PAUL CARLUCCI

2 Q Have you ever discussed with Col
3 Allan the decision to terminate any editor
4 at The New York Post?

5 A Not that I recall.

6 Q Have you ever told Col Allan that
7 he should terminate any editor at The New
8 York Post?

9 A No.

10 Q Has Col Allan ever discussed with
11 you the possibility of terminating any
12 editor at The New York Post?

13 MR. KASOWITZ: You can answer.

14 A Not that I recall.

15 Q As publisher of The New York Post,
16 Mr. Carlucci, who makes the decisions
17 regarding whether a particular employee
18 should receive a certain amount in annual
19 salary, you or someone else?

20 MR. KASOWITZ: I'm going to
21 object to the question.

22 It's just unclear to me. You said
23 as publisher --

24 MR. THOMPSON: I'll rephrase
25 it.

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1 PAUL CARLUCCI
2 MR. THOMPSON: Mr. Kasowitz,
3 I'm attempting to do so. As you
4 know, there's a lot of traffic going
5 by. I want him to finish. I want
6 him to finish all the questions so
7 the record could be developed.

8 If you haven't finished your last
9 answer, I'll have it repeated so your
10 answer is fully stated on the record.

11 MR. KASOWITZ: We are going to
12 do that. You have a habit,
13 Mr. Thompson, of trying to ask
14 a question before the next question
15 is finished. I don't know why you do
16 it. I don't know whether you think
17 you get an advantage by doing it. I
18 don't know. But it's not going to
19 happen.

20 And that is part of the Federal
21 Rules.

22 All right. So let's go back to
23 that question. Let's hear the witness'
24 answer. If he has anything to add to it,
25 then he will. If not, then we can move

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1 PAUL CARLUCCI

2 MR. KASOWITZ: Do you have
3 anything to add to that?

4 THE WITNESS: I don't know if I
5 do or not. That's fine. That would
6 be my opinion.

7 Q Okay.

8 And so Mr. Carlucci, your opinion
9 that there was no racist intent behind the
10 cartoon is not based on any conversation you
11 had with any editor at The New York Post
12 about the cartoon, correct?

13 MR. KASOWITZ: Object to form.

14 You can answer.

15 A That would be correct.

16 Q Do you know if any employee at
17 The New York Post complained about this
18 cartoon?

19 A Not that I recall.

20 Q Do you know if any employee at
21 The New York Post objected to this cartoon?

22 MR. KASOWITZ: Object to form.

23 You can answer.

24 A Not that I recall.

25 Q Do you know if Sandra Guzman ever

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1 PAUL CARLUCCI

2 on.

3 MR. THOMPSON: Mr. Kasowitz, I
4 don't have a habit of trying to get
5 the witness to answer a question
6 before the witness is finished. The
7 witness has answered the questions
8 and when I thought he finished, I ask
9 my next question. You don't have to
10 remind of me the Federal Rules are.
11 I know the Federal Rules.

12 BY MR. THOMPSON:

13 Q Mr. Carlucci, I'm going to have the
14 last question asked again and if you have
15 answered it, tell me. If you want to add
16 anything to it, let me know.

17 (Requested portion of record read:

18 "Q. Now, when you say you don't
19 believe that the intent was racist, as
20 you sit here today, can you tell us if
21 you spoke to anyone at The Post on the
22 Editorial side about the cartoon that led
23 you to believe that it wasn't intended to
24 be racist?"

25 (End of read-back.)

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1 PAUL CARLUCCI

2 objected to this cartoon?

3 A No, I do not.

4 Q Do you know if Ms. Guzman ever
5 complained about this cartoon during her
6 employment at The Post?

7 A Not that I recall.

8 MR. KASOWITZ: Can we go off
9 the record for a second.

10 THE VIDEOGRAPHER: The time is
11 12:27. We're going off the record.

12 (Discussion off the record.)

13 THE VIDEOGRAPHER: The time is
14 12:28. Back on the record.

15 MR. THOMPSON: Can we have that
16 marked as Carlucci Number 2.

17 (Carlucci Exhibit 2, E-mail
18 chain, top e-mail dated Thursday,
19 February 19, 2009, 4:18 p.m., Bates
20 Number NYP-1818, was marked for
21 Identification.)

22 MR. THOMPSON: For the record,
23 Carlucci Deposition Exhibit 2 is
24 Bates stamped NYP-1818.

25 Q Mr. Carlucci, please take moment

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1 PAUL CARLUCCI
 2 What topic was he supposed to discuss at
 3 this meeting?
 4 A It appears that he was to discuss
 5 "Tempo, performance and decision."
 6 Q Do you know what this statement
 7 "Tempo, performance and decision" meant in
 8 April of 2006, as reflected in this
 9 Executive Committee agenda?
 10 A From reading the minutes I do
 11 currently now, but I don't recall it prior
 12 to reading the minutes just now.
 13 Q Well, tell us today what that term
 14 "Tempo, performance and decision" means.
 15 A It appears to be a discussion if
 16 Tempo should continue publishing in spite of
 17 a down trend in advertising, and is there
 18 any way to salvage some of the advertisers
 19 that were built up, maintain the revenue
 20 and/or reduce expense.
 21 It is a determination and open
 22 discussion, it appears to be at Executive
 23 Committee, of should we continue Tempo.
 24 Q Do you know if Howard Adler was the
 25 person who was responsible for leading that

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1 PAUL CARLUCCI
 2 any comments at the Executive Committee that
 3 was scheduled for April 17, 2006?
 4 A No, I do not.
 5 Q I want to direct your attention to
 6 the second page of that exhibit, which is
 7 Bates stamped NYP-463.
 8 A Yes.
 9 Q Can you read into the record the
 10 text on that page?
 11 A Yes. "Review of Tempo's performance
 12 (attached) - Patrick, review the pros and
 13 cons of the Tempo section. He reviewed the
 14 various financial implications of
 15 eliminating the weekly pages and holding the
 16 monthly section. However, all options
 17 operate at a loss. Paul decided to cancel
 18 the section. Action: Amy, Jennifer and
 19 Patrick to put together an exit strategy and
 20 review at the next week's meeting."
 21 Q You see at the bottom of that page
 22 in the left-hand corner it says Executive
 23 Committee Minutes.
 24 Do you see that?
 25 A Yes, I do.

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1 PAUL CARLUCCI
 2 discussion?
 3 A I do not know that.
 4 Q Did Howard Adler have any role over
 5 Tempo in April of 2006?
 6 A Howard was in charge of
 7 advertising, so he would be responsible
 8 for the advertising and revenue of the
 9 product, ultimately.
 10 Q And you see where it says "Topic:
 11 Human Resources Presenter Amy Scaldone"?
 12 A Yes, I do.
 13 Q Do you know why Amy Scaldone was
 14 expected to be at this New York Post
 15 Executive Committee meeting scheduled for
 16 April 17, 2006?
 17 A No, I do not.
 18 Q And you see Col Allan was also
 19 expected to be at the same meeting, correct?
 20 A Yes, I do see that.
 21 Q Was there any discussion at this
 22 meeting in April 2006 about terminating
 23 Ms. Guzman's employment?
 24 A I cannot recall.
 25 Q Do you recall if Amy Scaldone made

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1 PAUL CARLUCCI
 2 Q Now, do you know who's referred to
 3 in the text you just read that's identified
 4 as Patrick?
 5 A Yes.
 6 Q Who is that person?
 7 A Patrick Judge.
 8 Q Now, was there a discussion in
 9 April 2006 about eliminating the weekly
 10 pages of Tempo and holding the monthly
 11 section?
 12 A I do not recall a discussion.
 13 Q Did you at any point in April of
 14 2006 decide to cancel the Tempo section?
 15 A I certainly could have, but I do
 16 not remember having that discussion.
 17 Q When it says "Paul decided to
 18 cancel this section," who do you believe is
 19 being referred to when it says "Paul"?
 20 A I believe it would be me.
 21 Q As you are sit here today,
 22 Mr. Carlucci, do you have any recollection
 23 about any comments you made at the meeting
 24 that was scheduled for April 17, 2006 about
 25 whether the Tempo section would be canceled?

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1 PAUL CARLUCCI

2 MR. KASOWITZ: Object to form.

3 You can answer.

4 A I do not remember any comments that
5 I made or if any I made any comments at the
6 time.

7 Q Do you recall any discussion at the
8 meeting that was scheduled to take place on
9 April 17, 2006 by The New York Post
10 Executive Committee?

11 A No, I do not.

12 Q Well, do you know if there was any
13 discussion about Sandra Guzman during that
14 meeting?

15 A No, I do not.

16 Q So as you sit here today -- strike
17 that.

18 Do you know if anyone suggested at
19 that meeting that Ms. Guzman's employment
20 should be terminated?

21 MR. KASOWITZ: Object to form.

22 You can answer.

23 A I do not.

24 Q Well, on April 17, 2006, who had
25 the authority at The New York Post to make

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1 PAUL CARLUCCI

2 the decision as to whether the Tempo section
3 would be eliminated or not?

4 MR. KASOWITZ: Object to form.

5 You can answer.

6 A I think it was a group discussion
7 and the authority it would go with on would
8 be based on the P & L factors. And I think
9 there was quite a difference of opinion to
10 continue or not.

11 Q Why do you believe there was
12 a group discussion regarding what should
13 happen with the Tempo section in April 2006?

14 MR. KASOWITZ: Just to be
15 clear, are you testifying about an
16 April 2006 meeting or are you talking
17 about some other meeting?

18 BY MR. THOMPSON:

19 Q I'm only asking you about
20 April 2006.

21 MR. KASOWITZ: And you just
22 testified you don't recall a
23 discussion. So I want to make sure
24 we're clear on the record.

25 A The only reason I testified I

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1 PAUL CARLUCCI

2 thought it was a group discussion because of
3 the extensive documents that were in the
4 minutes that you just distributed that I
5 don't recall.

6 Q But as you sit here today --

7 MR. KASOWITZ: Do you recall --
8 I'm sorry. I apologize. I
9 apologize, Mr. Thompson. You are
10 absolutely correct. Just want to
11 make sure we were clear.

12 MR. THOMPSON: One trial lawyer
13 to another. Sometimes you step over
14 each other's toes.

15 MR. KASOWITZ: It's all good.

16 Q Mr. Carlucci, do you have any
17 independent recollection, as you sit here
18 today, about whether there was a group
19 discussion at the meeting that was scheduled
20 for April 17, 2006 about whether the Tempo
21 section should be canceled?

22 A No, I do not.

23 Q In April 2006, who had the
24 authority to make the decision to cancel the
25 Tempo section?

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1 PAUL CARLUCCI

2 MR. KASOWITZ: Object to form.

3 You can answer if you know.

4 A I think it would be a combination
5 of individuals.

6 Q Combination of the individuals who
7 made up The New York Post Executive
8 Committee?

9 A I think they would be represented
10 on the Executive Committee, yes.

11 Q Do you know of any other
12 individuals who would have also had
13 authority to make the decision to cancel the
14 Tempo section besides the members of The New
15 York Post Executive Committee?

16 A No, I do not.

17 Q So the authority to cancel --
18 strike that.

19 So the authority whether or not to
20 cancel Tempo resided with members of The New
21 York Post Executive Committee in April 2006,
22 right?

23 MR. KASOWITZ: Object to form.

24 You can answer.

25 A I think that would be correct.

<p style="text-align: right;">Page 230</p> <p>1 PAUL CARLUCCI</p> <p>2 Q Who had the authority in April 2006</p> <p>3 to determine whether the Puerto Rican Day</p> <p>4 Parade would be eliminated from the budget?</p> <p>5 A I think if there was a section --</p> <p>6 and I don't recall that there was a</p> <p>7 section -- we certainly weren't in charge of</p> <p>8 the parade itself. And I don't recall if we</p> <p>9 had a section or if we had individual</p> <p>10 advertising pages associated with the</p> <p>11 parade.</p> <p>12 And I do not know who would have</p> <p>13 brought that up. And the ultimate</p> <p>14 authority, if it was losing money, certainly</p> <p>15 would be on my docket.</p> <p>16 Q Meaning you would have had the</p> <p>17 ultimate authority to decide whether to</p> <p>18 eliminate the Puerto Rican Day Parade from</p> <p>19 the budget, correct?</p> <p>20 A After discussion and influence from</p> <p>21 others, yes.</p> <p>22 Q And when you say discussions and</p> <p>23 influence from others, you mean other</p> <p>24 members of The New York Post Executive</p> <p>25 Committee?</p>	<p style="text-align: right;">Page 231</p> <p>1 PAUL CARLUCCI</p> <p>2 A Yes.</p> <p>3 Q And if you can turn to the next</p> <p>4 page of this deposition exhibit.</p> <p>5 Can you read into the record the</p> <p>6 text at the top?</p> <p>7 A Yes. "Tempo exit strategy.</p> <p>8 Jennifer reported that June 7 will be the</p> <p>9 last edition of Tempo. Two sales</p> <p>10 executives, Sammy and Carolina, would be</p> <p>11 reassigned to other sales positions. Two</p> <p>12 positions will be eliminated, Sandra Guzman</p> <p>13 and Tony Martinez.</p> <p>14 "Action. Call to tell Jennifer</p> <p>15 when she could inform Sandra as well as the</p> <p>16 other staff. We recommend it as late as</p> <p>17 possible. Amy and Jennifer to put together</p> <p>18 severance packages."</p> <p>19 Q Now, Mr. Carlucci, reading that</p> <p>20 text, does that refresh your recollection as</p> <p>21 to whether a decision was made to cancel</p> <p>22 Tempo in April of 2006?</p> <p>23 A No, it doesn't.</p> <p>24 Q Do you recall now after reading</p> <p>25 this text whether there was any discussion</p>
<p style="text-align: right;">Page 232</p> <p>1 PAUL CARLUCCI</p> <p>2 in the meeting scheduled for April 24, 2006</p> <p>3 about whether Ms. Guzman's employment should</p> <p>4 be terminated?</p> <p>5 A No, I do not.</p> <p>6 Q Based on this text that you just</p> <p>7 read, do you know who made the decision to</p> <p>8 terminate Ms. Guzman's employment after</p> <p>9 April 2006 as reflected in this document?</p> <p>10 I'll rephrase it.</p> <p>11 You see where it says "Two</p> <p>12 positions will be eliminated," correct?</p> <p>13 A Yes.</p> <p>14 Q Do you know if a decision was made</p> <p>15 in April 2006 to eliminate Sandra Guzman's</p> <p>16 position?</p> <p>17 A I do not know that.</p> <p>18 Q Do you know if a decision was made</p> <p>19 at any point in April 2006 to eliminate</p> <p>20 Ms. Guzman's position?</p> <p>21 A I do not know that.</p> <p>22 Q Well, you do know that the document</p> <p>23 that you just read is Bates stamped NYP-461,</p> <p>24 states at the bottom left-hand corner</p> <p>25 "Executive Committee Minutes."</p>	<p style="text-align: right;">Page 233</p> <p>1 PAUL CARLUCCI</p> <p>2 Do you see that?</p> <p>3 A Yes, I do.</p> <p>4 Q Do you have any doubt,</p> <p>5 Mr. Carlucci, that these minutes reflect</p> <p>6 discussions made at an Executive Committee</p> <p>7 meeting sometime in 2006?</p> <p>8 MR. KASOWITZ: Object to form.</p> <p>9 You can answer.</p> <p>10 A If the question is: Did I think</p> <p>11 the discussion was discussed, that the</p> <p>12 subject was discussed?</p> <p>13 Q Yes.</p> <p>14 A Yes.</p> <p>15 Q But as you sit here now, do you</p> <p>16 have any independent recollection of that</p> <p>17 discussion?</p> <p>18 A No.</p> <p>19 Q Do you have any independent</p> <p>20 recollection of Sandra Guzman's name coming</p> <p>21 up at any Executive Committee meeting in</p> <p>22 April of 2006?</p> <p>23 A No, I do not.</p> <p>24 Q Do you have any independent</p> <p>25 recollection of Ms. Guzman's name coming up</p>

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1 PAUL CARLUCCI
 2 at all during any Executive Committee
 3 meeting in 2006?
 4 A No, I do not.
 5 Q Do you recall, Mr. Carlucci, making
 6 the decision to eliminate Sandra Guzman's
 7 employment in April of 2006?
 8 MR. KASOWITZ: Object to form.
 9 But you can answer.
 10 A No, I do not.
 11 Q Did you have any conversations with
 12 any member of The New York Post in April of
 13 2006 about terminating Ms. Guzman's
 14 employment?
 15 MR. KASOWITZ: Object to form.
 16 You can answer.
 17 A Not that I recall.
 18 Q Did you have any conversation with
 19 any member of News Corporation about whether
 20 Ms. Guzman's employment should be terminated
 21 in 2006?
 22 A No, I did not.
 23 Q Did you ever discuss with Col Allan
 24 anything about Sandra Guzman in April of
 25 2006?

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1 PAUL CARLUCCI
 2 I don't think that's what he meant.
 3 MR. THOMPSON: That's what he
 4 said and I'm trying to get to --
 5 MR. KASOWITZ: But he's
 6 testified he has no recollection
 7 about --
 8 MR. THOMPSON: Let him answer
 9 my question. He can clarify because
 10 he made a statement and I'm following
 11 up on his statement.
 12 MR. KASOWITZ: Right. But all
 13 I'm going to say is the statement you
 14 asked was about who had authority or
 15 who would have had authority. Is
 16 that right?
 17 MR. THOMPSON: Right. But he
 18 answered the question by saying
 19 people talked about or had input in
 20 the decision, and I'm asking him to
 21 clarify the record.
 22 BY MR. THOMPSON:
 23 Q In April of 2006, did anyone that
 24 you know of who was a member of The New York
 25 Post Executive Committee have any

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1 PAUL CARLUCCI
 2 MR. KASOWITZ: Object to form.
 3 If you recall.
 4 A Not that I recall.
 5 Q Do you recall speaking to anyone at
 6 The New York Post about Sandra Guzman in
 7 April of 2006?
 8 MR. KASOWITZ: Object to form.
 9 You can answer.
 10 A No, I don't.
 11 Q In April 2006, Mr. Carlucci, did
 12 members of the Executive Committee have the
 13 power to terminate Ms. Guzman's employment?
 14 MR. KASOWITZ: Object to form.
 15 You can answer.
 16 A I think there was input by members.
 17 And I certainly had the final decision of
 18 moving forward then, but I did not make that
 19 decision.
 20 Q Well, you say you think there was
 21 input in April 2006 about whether she would
 22 be terminated.
 23 Why do you say that?
 24 MR. KASOWITZ: I'm just going
 25 to object to that.

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1 PAUL CARLUCCI
 2 conversations about whether Ms. Guzman's
 3 employment should be terminated?
 4 A Not that I recall.
 5 Q So as you sit here today, you don't
 6 know who made the decision to eliminate
 7 Ms. Guzman's employment in April of 2006,
 8 correct?
 9 MR. KASOWITZ: Here's why I
 10 have to object to it.
 11 I'm objecting to it because unless
 12 you can show me some evidence that she
 13 was terminated at that time, there's no
 14 foundation for the question.
 15 If she had been terminated at the
 16 time, then it's a fair question.
 17 MR. THOMPSON: I'll rephrase
 18 it.
 19 Q As you sit here today, do you know
 20 who made the decision that Ms. Guzman's
 21 employment was to be eliminated as of
 22 April 2006?
 23 MR. KASOWITZ: Again, I'm going
 24 to object. No foundation.
 25 But you can answer, if you know.

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Q Yes.

A Just to experience going to Executive Committees. We've never discussed moving salespeople around. We'll talk about various things about revenue. It's usually not a focus. It usually is controlled and known and presided by the pyramid head within that area as long as he stays within his budget.

Q Did the Executive Committee, at any point after you created it, ever discuss the termination of the employment of any employee at The New York Post?

MR. KASOWITZ: If you know.

A Not that I could recall a conversation about a specific individual.

Q So as you sit here today, Mr. Carlucci, you can't recall a single time when The New York Post Executive Committee discussed terminating the employment of any employee, can you?

A Of a particular employee, no.

MR. THOMPSON: Can we have this marked as Deposition Exhibit Number 7

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A Correct.

Q As well as Amy Scaldone, correct?

A Yes.

Q Now, do you know Col Allan -- strike that.

Do you know if the meeting occurred on May 30, 2006?

A I'm not sure if it did or not.

Q Do you have any reason to believe that the meeting scheduled for that date was canceled?

A No, I do not.

Q Do you know if Col Allan made any comments during the Executive Committee meeting that was scheduled for May 30, 2006?

A I'm not even sure if Col Allan attended and I don't recall any comments if he did attend. But I don't remember if he was there or not. If I was there, also.

Q Can you read the text into the record that's on Page NYP-448.

A Yes. "Tempo action. Call Jennifer to meet to discussion staff issues surrounding the cancellation of Tempo."

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which is Bates stamped NYP-447 through 448.

(Carlucci Exhibit 7, Executive Committee Agenda, dated May 30, 2006, Bates Numbers NYP-447 through NYP-448, was marked for Identification.)

BY MR. THOMPSON:

Q Mr. Carlucci, take a moment and review Deposition Exhibit Number 7 and tell us if you recognize it.

A I do not recall it.

Q You see it's a New York Post Executive Committee agenda dated May 30, 2006, correct?

A Yes.

Q And it reflects there was supposed to be a meeting of the Executive Committee held on that date at 8:30 a.m., correct?

A That's correct.

Q And you were expected to be in attendance of that meeting, correct?

A Yes.

Q So was Col Allan, correct?

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PAUL CARLUCCI

Q Do you know, Mr. Carlucci, whether there was a decision made as of May 30, 2006 to cancel the Tempo section?

A I do not know if there was.

Q Do you know if Jennifer Jehn made any comments in the meeting that was scheduled for May 30, 2006?

A I do not know if she did or not.

Q Do you know if there was any decision made as of May 30, 2006 to terminate Sandra Guzman's employment?

A No, I do not.

Q Do you have any independent recollection as to whether Sandra Guzman's employment was discussed at the meeting scheduled to take place on May 30, 2006?

A No, I do not.

Q I want to direct your attention back to Deposition Exhibit Number 6. You see Col Allan was expected to be at that meeting on April 24, 2006, correct?

A Yes.

Q Do you have any independent recollection as to whether Col Allan was in